

ECF CASE  
JUDGE CHIN

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

**J & J SPORTS PRODUCTIONS, INC., as  
Broadcast Licensee of the May 5, 2007  
DeLaHoya/Mayweather Program,**

Plaintiff,

-against-

**AFFIDAVIT IN SUPPORT OF  
REQUEST FOR DEFAULT**  
Civil Action No. 07-CV-08855  
HON.DENNY CHIN

HAROLD C. GRAHAM, Individually, and as officer, director, shareholder and/or principal of REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL,

and

REFLECTION BAR & LOUNGE INC. d/b/a  
REFLECTIONS BAR & LOUNGE a/k/a  
REFLECTIONS BAR AND GRILL,

Defendants.

STATE OF NEW YORK :  
: SS.:  
COUNTY OF ULSTER :

JULIE COHEN LONSTEIN, being duly sworn, deposes and says:

1. That I am the attorney for plaintiff, **J & J SPORTS PRODUCTIONS, INC.**, in the above referenced matter and I am admitted to practice in this Court. I am fully familiar with all the facts, circumstances and proceedings heretofore had herein.

2. This action was commenced pursuant to 47 U.S.C. §605, *et seq.* A copy of the Summons and Complaint was served on Defendant, HAROLD C. GRAHAM, Individually, and

as officer, director, shareholder and/or principal of REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL, as set forth in the proof of service by Peter Del Bene, ECF Document No. 4 and REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL, as set forth in the proof of service by Jessica Miller, ECF Document No. 3.

3. The time within which any of the Defendants may answer or otherwise move with respect to the Complaint herein has expired. Defendants HAROLD C. GRAHAM, Individually, and as officer, director, shareholder and/or principal of REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL, and REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL, have not answered or otherwise moved with respect to the Complaint; and the time for the Defendant(s) to do so has not been extended.

4. Said Defendant(s) are not infants or incompetents. Upon information and belief, Defendant(s) are not presently in the military service of the United States.

**WHEREFORE**, Plaintiff **J & J SPORTS PRODUCTIONS, INC.**, requests that the default of the Defendant(s) HAROLD C. GRAHAM, Individually, and as officer, director, shareholder and/or principal of REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL, and REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE a/k/a REFLECTIONS BAR AND GRILL be noted and that judgment be entered in favor of plaintiff and against defendants in the manner stated herein.

Dated: December 26, 2007  
Ellenville, NY 12428

Sworn to before me this 26th  
day of December, 2007

/S/ Julie Cohen Lonstein

Julie Cohen Lonstein  
Bar Roll No. JL8512

/s/ April Draganchuk

***April Draganchuk***

***Notary Public State of New York***

***Registration No. 4945872***

***Residing in Ulster County***

***My Commission Expires Jan. 27, 2011***